

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to the Debtors and Debtors in Possession

In re:

NEW JERSEY ORTHOPAEDIC INSTITUTE LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 25-11370 (JKS)

(Jointly Administered)

HEARING DATE AND TIME:

June 10, 2025 at 10:00 a.m.

OBJECTION DEADLINE:

June 3, 2025

**NOTICE OF DEBTORS' MOTION FOR AN ORDER EXTENDING THE DEADLINE
FOR THE DEBTORS TO ASSUME OR REJECT UNEXPIRED LEASES OF
NONRESIDENTIAL REAL PROPERTY PURSUANT TO 11 U.S.C § 365(d)(4)**

PLEASE TAKE NOTICE that on **June 10, 2025 at 10:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard, the above-captioned debtors (the "Debtors"), by and through their undersigned counsel, will move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, Courtroom 3D, for entry of an order, substantially in the form

¹ The last four digits of Debtor New Jersey Orthopaedic Institute LLC's tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC's tax identification number are 9828. The location of both Debtors' principal place of business and the Debtors' service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

submitted herewith, extending the deadline for the Debtors to assume or reject unexpired leases of nonresidential real property pursuant to 11 U.S.C. § 365(d)(4) (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the Debtors shall rely upon the Motion submitted concurrently herewith and the declaration and exhibit thereto. The Debtors submit that no separate memorandum of law is necessary because the applicable law is adequately set forth in the supporting Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-2 by **June 3, 2025**.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

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PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

Dated: May 16, 2025

SAUL EWING LLP

By: /s/ Stephen B. Ravin
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